

LEONARD T. FINK, ESQ.
Nevada Bar No. 6296
NAKESHA S. DUNCAN-PEREZ, ESQ.
Nevada Bar No. 11556
CARMEN A. ERMER, ESQ.
Nevada Bar No. 16075
SPRINGEL & FINK LLP
9075 W. Diablo Drive, Suite 302
Las Vegas, Nevada 89148
Telephone: (702) 804-0706
E-Mail: lfink@springelfink.com
nduncan@springelfink.com
cermer@springelfink.com
efiling@springelfink.com

Attorneys for Defendants/Cross-Defendant
PREVENTIVE MEASURES SECURITY FIRM, LLC,
MARCO SOLORIO and LEONARD MORRIS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MACK MILLER, an individual;

Plaintiff,

vs.

CLARK COUNTY, NEVADA, a political
subdivision; DOE CLARK COUNTY
OFFICERS, in their personal capacities; DOE
PRIVATE SECURITY GUARDS, in their
personal capacities; PREVENTIVE
MEASURES SECURITY FIRM, LLC, a
domestic limited liability company; MARCO
SOLORIO, individually; LEONARD MORRIS,
individually; ROE PRIVATE SECURITY
COMPANY; DOES 1 through 20; ROE
BUSINESS ENTITIES 1 through 20, inclusive
jointly and severally,

Defendants.

CLARK COUNTY, a Political Subdivision of
State of Nevada,

Cross-claimant,

Case No.: 2:23-cv-00070-CDS-DJA

SUBSTITUTION OF COUNSEL

1 vs.

2 PREVENTIVE MEASURES SECURITY
3 FIRM, LLC, a domestic limited liability
4 Company,

5 Cross-defendant.

6 TO: ALL INTERESTED PARTIES; and

7 TO: THEIR RESPECTIVE COUNSEL OF RECORD.

8 Defendant/Cross-Defendant, PREVENTIVE MEASURES SECURITY FIRM, LLC, Defendant
9 MARCO SOLORIO and Defendant LEONARD MORRIS hereby substitutes, Leonard T. Fink, Esq.,
10 Nakesha S. Ducan-Perez, Esq., and Carmen A. Ermer, Esq. of the law firm of Springel & Fink LLP, as
11 counsel of record in the above-entitled action.

12 On behalf of Defendant/Cross-Defendant, PREVENTIVE MEASURES SECURITY FIRM, LLC,
13 I, David Sutton, hereby consent to the substitution of Leonard T. Fink, Esq.,
14 Nakesha S. Ducan-Perez, Esq., and Carmen A. Ermer, Esq. of the law firm of Springel & Fink LLP, as
15 counsel of record in the above-entitled action.

16 DATED this 30 day of August, 2024

PREVENTIVE MEASURES SECURITY FIRM, LLC

17 By: /s/ [Signature]
18 Signature

19 Name: David Sutton
20 Printed Name

21 Title: Chief Operating Officer

22 I, MARCO SOLORIO, hereby consent to the substitution of Leonard T. Fink, Esq., Nakesha S.
23 Ducan-Perez, Esq., and Carmen A. Ermer, Esq. of the law firm of Springel & Fink LLP, as counsel of
24 record in the above-entitled action.

25 DATED this 30 day of August, 2024

MARCO SOLORIO

26 By: /s/ Marco Solorio
27 Signature
28

1 I, LEONARD MORRIS, hereby consent to the substitution of Leonard T. Fink, Esq., Nakesha S.
2 Ducan-Perez, Esq., and Carmen A. Ermer, Esq. of the law firm of Springel & Fink LLP, as counsel of
3 record in the above-entitled action.

4 DATED this 5th day of September, 2024

LEONARD MORRIS

5
6 By: /s/Leonard Morris
Signature

7
8 I, Russell D. Christian, Esq., hereby agree and consent to the substitution of Leonard T. Fink, Esq.,
9 Nakesha S. Duncan-Perez, Esq., and Carmen A. Ermer, Esq. of the law firm of Springel & Fink LLP, as
10 counsel of record for Defendant/Cross-Defendant, PREVENTIVE MEASURES SECURITY FIRM, LLC
11 in the above-entitled action.

12 DATED this 5th day of September, 2024

TYSON & MENDES

13 By: /s/ Russel D. Christian
14 Russell D. Christian, Esq.
15 Nevada Bar No. 11785
2835 St. Rose Parkway, Suite 140
Henderson, Nevada 89052

16 I, Nakesha S. Duncan-Perez, Esq. of the law firm of Springel & Fink LLP, am duly admitted to
17 practice in this District, and hereby agree and consent to the substitution as counsel of record for
18 Defendant/Cross-Defendant, PREVENTIVE MEASURES SECURITY FIRM, LLC in the above-entitled
19 action.

20
21 DATED this 5th day of September, 2024.

SPRINGEL & FINK LLP

22 /s/ Nakesha S. Duncan-Perez
23 By:

24 Leonard T. Fink, Esq.
Nevada Bar No. 6296
Nakesha S. Duncan-Perez, Esq.
Nevada Bar No. 11556
Carmen A. Ermer, Esq.
Nevada Bar No. 16075
Attorneys for Defendants/Cross-Defendant
PREVENTIVE MEASURES SECURITY FIRM,
LLC, MARCO SOLORIO and LEONARD MORRIS

25 **IT IS SO ORDERED.**

26 DATED: 9/9/2024

27 
28 DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE**Miller, Mack v. Clark County, Nevada, et al.****United States District Court Case No. 2:23-cv-00070-CDS-DJA**

STATE OF NEVADA)
COUNTY OF CLARK) ss.

I, Lucinda Mian, declare:

I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen years and not a party to the within action. My business address is 9075 W. Diablo Drive, Suite 302, Las Vegas, Nevada, 89148.

On **September 5, 2024**, I served the document described as **SUBSTITUTION OF COUNSEL** on the following parties:

**** SEE ELECTRONIC SERVICE LIST**

<input checked="" type="checkbox"/>	VIA ELECTRONIC SERVICE: by submitting the foregoing to the Court's E-filing System for Electronic Service upon the Court's Service List pursuant to EDCR 8. The copy of the document electronically served bears a notation of the date and time of service. The original document will be maintained with the document(s) served and be made available, upon reasonable notice, for inspection by counsel or the Court.
<input type="checkbox"/>	VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas Nevada. I am "readily familiar" with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business.
<input type="checkbox"/>	VIA FACSIMILE: by transmitting to a facsimile machine maintained by the person on whom it is served at the facsimile machine telephone number at last given by that person on any document which he/she has filed in the cause and served on the party making the service. The copy of the document served by facsimile transmission bears a notation of the date and place of transmission and the facsimile telephone number to which transmitted. A confirmation of the transmission containing the facsimile telephone numbers to which the document(s) was/were transmitted will be maintained with the document(s) served.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Lucinda Mian

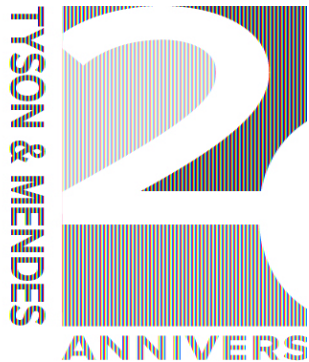
An employee of Springel & Fink LLP

Lucinda Mian

From: Russell Christian <RChristian@TysonMendes.com>
Sent: Wednesday, September 4, 2024 10:32 AM
To: Lucinda Mian
Cc: MillerMackvClarkCountyNevadaatalZ12283933@springelfink.filevineapp.com; Nakesha Duncan-Perez; Carmen Ermer; Leonard Fink; J.J. Kashnow
Subject: RE: Substitution of Counsel - Miller, Mack v. Clark County, Nevada, at al. - Our file no. 24.137

Thank you, you may affix my electronic signature.

-Russell



Russell D. Christian, Esq.
Senior Counsel
2835 St. Rose Pkwy, Suite #140
Henderson, NV 89052
Main: (702) 724-2648
Cell: (702) 534-8146
Fax: (702) 410-7684
rchristian@tysonmendes.com
www.tysonmendes.com

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From: Lucinda Mian <lmian@springelfink.com>
Sent: Wednesday, September 4, 2024 8:56 AM
To: Russell Christian <RChristian@TysonMendes.com>
Cc: MillerMackvClarkCountyNevadaatalZ12283933@springelfink.filevineapp.com; Nakesha Duncan-Perez <nduncan@springelfink.com>; Carmen Ermer <cermer@springelfink.com>; Leonard Fink <lfink@springelfink.com>; J.J. Kashnow <jkashnow@springelfink.com>
Subject: Substitution of Counsel - Miller, Mack v. Clark County, Nevada, at al. - Our file no. 24.137

Counsel,

Good morning. Please see attached Substitution of Counsel. . Please review if the document is acceptable, please let me know if we have authority to affix electronic signature.

Thank you,

Lucinda Mian
Legal Assistant



9075 W. Diablo Drive., Suite 302 | Las Vegas, NV 89148
Tel: 702-804-0706 | Fax: 702-804-0798

This email has been scanned for spam and viruses. Click [here](#) to report this email as spam.

Lucinda Mian

From: Leonard Morris jr. [REDACTED]
Sent: Tuesday, September 3, 2024 5:21 PM
To: Lucinda Mian
Cc: MillerMackvClarkCountyNevadaatalZ12283933@springelfink.filevineapp.com; Nakesha Duncan-Perez; Carmen Ermer; Leonard Fink; J.J. Kashnow
Subject: Re: Substitution of Counsel - Miller, Mack v. Clark County, Nevada, at al. - Our file no. 24.137
Attachments: image001.jpg

Yes, I approve.

On Fri, Aug 30, 2024, 8:50 AM Lucinda Mian <lmian@springelfink.com> wrote:

Mr. Morris,

Good afternoon. I am Carmen Ermer's legal assistant. Ms. Ermer is an attorney with Springel & Fink – the firm the insurance carrier has transferred the Miller v. Clark County matter to from Tyson & Mendes.

Please see the attached substitution of counsel. In order for us to step in on your behalf, we need you to sign or your permission to affix your electronic signature on the substitution.

Please feel free to contact me at 702-804-0706.

Thank you,

Lucinda Mian
Legal Assistant



[9075 W. Diablo Drive., Suite 302 | Las Vegas, NV 89148](#)
Tel: 702-804-0706 | Fax: 702-804-0798